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**From:** Feldman, Michael [Feldman.Michael@epa.gov]  
**Sent:** 8/26/2020 1:46:25 PM  
**To:** Donna Huff [donna.huff@tceq.texas.gov]  
**CC:** Donaldson, Guy [Donaldson.Guy@epa.gov]; Snyder, Erik [snyder.erik@epa.gov]; Imhoff, Robert [imhoff.robert@epa.gov]  
**Subject:** Ohio Round 3 SO2 designations  
**Attachments:** 32\_oh\_so2\_rd3-final-proposal.pdf; 32-oh-so2-rd3-final\_designation.pdf; DRR designations 2017-28423.pdf; 2017-18423.-EPA R4 NA.pdf; EPA-HQ-OAR-2017-0003-0211\_content.pdf; 1609401-PSD Final.pdf

Donna – attached is the information for the Ohio Round 3 designation action: intended and final designation notices, Ohio TSD for proposal and final, and the draft permit and final permit for Charter Steel.

The DRR source in the area, Medical Center opted to replace its two coal-fired boilers with a natural gas boiler by January 13, 2017. That facility's new SO2 emission limit is 1.18 tons per year (tpy). The monitor exceedances were investigated and tied back to nearby fugitive emissions at Charter Steel.

The final TSD states:

Ohio submitted a final permit for Charter Steel in Cuyahoga County. This permit supports the modeling analysis Ohio previously submitted to demonstrate that monitored violations in the area were due to uncharacteristic fugitive emissions at Charter Steel and that the new permit restrictions will prevent further violations and yield current compliance with the 2010 SO<sub>2</sub> NAAQS.

PDF Page 6 (Final Permit) – “Finally, the PTI modification has provided a permitting opportunity for Ohio EPA to impose significant requirements on the operation of the West End Door, which Ohio EPA believes is a contributor to elevated SO<sub>2</sub> readings at the nearby Harvard Avenue monitor. These requirements are expected to allow the area to be designated “attainment” when final designations are promulgated by USEPA at the end of the year.”

PDF Page 113 (Final Permit) – “The permittee shall employ the lowest achievable emission rate (LAER) measures for fugitive sulfur dioxide emissions escaping the melt shop building. Escaping visible fugitive dust emissions shall be used as the indicator for the existence of conditions that are also conducive to the escape of fugitive sulfur dioxide emissions, if present. The LAER measures shall be sufficient to minimize or eliminate visible emissions of fugitive dust from the door opening at the west end of the melt shop through which scrap cars enter and exit (“west end door” or “west end melt shop door”). The permittee shall operate the west end door when the EAF (P900) is in operation such that it remains closed to 6 feet above grade or less except when scrap cars are entering or exiting the melt shop. The presence of visible emissions of fugitive dust escaping the west end door is not a deviation of the LAER requirement provided the permittee complies with this additional term and condition and the operating restrictions, monitoring and recordkeeping, and reporting requirements set forth in, c)(8), d)(17) through d)(19), and e)(7) and e)(8) below.”

*Michael Feldman, PhD*

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